

PUBLIC SUBMISSION

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Docket: EPA-HQ-OPP-2013-0226

Petition to Establish Tolerances for Chemical Flupyradifurone - First Food Use

Comment On: EPA-HQ-OPP-2013-0226-0007

Public Participation Memorandum for New Active Ingredient Flupyradifurone

Document: EPA-HQ-OPP-2013-0226-0019

Anonymous public comment

Submitter Information

General Comment

I am an extension entomologist with The University of Georgia. My responsibilities are for insect pest management in commercial vegetable production. I have worked with Sivanto (flupyradifurone) for three years. This insecticide has shown great promise in management of silverleaf whitefly (SLWF). SLWF is an annual problem in much of South Georgia and impacts production in a variety of vegetable crops. While growers do have a variety of insecticides available for management of this pest, the cornerstones are the neonicotinoids and the diamide chemistries. We have experienced resistance issues with the neonics, which threatens to leave us with a single mode of action as the basis for whitefly management. This would not be a good situation. While Sivanto is a neonic, it belongs to a separate sub-class (IRAC Group 4C vs 4A) and available data suggests a lack of cross resistance with this insecticide; thus, providing a valuable tool for resistance management. Sivanto has also shown good efficacy against adult whiteflies. With the loss of endosulfan, we lack an insecticide with efficacy against the adults.

I encourage approval of the registration of Sivanto as it will provide our growers with a valuable tool for management of silverleaf whitefly.

